

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT
ON STATUS AND RESOLUTION OF
OMNIBUS OBJECTIONS WITH
RESPECT TO CERTAIN CLAIMS**

**[Re: Docket Nos. 9455, 9462, 9466, 9888,
10281, 10287, 10425, 10428, 10431, and
10434]**

**Regarding Objections Set for Hearing
May 11, 2021 at 10:00 a.m. (Pacific Time)**

REPORT ON RESOLUTION OF CERTAIN CLAIMS

In advance of the May 11, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby report on the status and resolution of certain Claims in the following omnibus claims objections:

Docket No.	Omnibus Objection
9455	<i>Reorganized Debtors’ Fortieth Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the “ Fortieth Omnibus Objection ”)
9462	<i>Reorganized Debtors’ Forty-Third Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the “ Forty-Third Omnibus Objection ”)
9466	<i>Reorganized Debtors’ Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed Claims)</i> (the “ Forty-Fifth Omnibus Objection ”)
9888	<i>Reorganized Debtors’ Fifty-First Omnibus Objection to Claims (Books and Records Claims)</i> (the “ Fifty-First Omnibus Objection ”)
10281	<i>Reorganized Debtors’ Sixtieth Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the “ Sixtieth Omnibus Objection ”)
10287	<i>Reorganized Debtors’ Sixty-Second Omnibus Objection to Claims (Books and Records Claims)</i> (the “ Sixty-Second Omnibus Objection ”)
10425	<i>Reorganized Debtors’ Sixty-Ninth Omnibus Objection to Claims (Books and Records Claims)</i> (the “ Sixty-Ninth Omnibus Objection ”)
10428	<i>Reorganized Debtors’ Seventieth Omnibus Objection to Claims (Satisfied Claims)</i> (the “ Seventieth Omnibus Objection ”)
10431	<i>Reorganized Debtors’ Seventy-First Omnibus Objection to Claims (No Liability Claims)</i> (the “ Seventy-First Omnibus Objection ”)
10434	<i>Reorganized Debtors’ Seventy-Second Omnibus Objection to Claims (Customer No Liability / Passthrough Claims)</i> (the “ Seventy-Second Omnibus Objection ”)

Docket No.	Claimant	Claim No.	Resolution
Fortieth Omnibus Objection			
9664	Martha Gerstner	3524	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the hearing on the Claim be taken off calendar and continued indefinitely in the interim.

Docket No.	Claimant	Claim No.	Resolution
Forty-Third Omnibus Objection			
9737	Bruce and Kathleen Shaw	1722	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the hearing on the Claim be taken off calendar and continued indefinitely in the interim.
Forty-Fifth Omnibus Objection			
9660 9662	Gordon N. Ball, Inc. (GNB)	4463	The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fifth Omnibus Objection.
9619	Shou Kun Huang and Henry Huang	7920	The Reorganized Debtors have sent settlement agreements to the Claimants on March 1, 2021, April 6, 2021, and April 19, 2021, and followed up by telephone on April 23, 2021 and May 5, 2021. No response has been received to date. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to May 26, 2021 at 10:00 a.m.
Informal	John I. Weaver	2932	The Reorganized Debtors wish to resolve and pay the Claim, but, given its unliquidated nature, cannot do so without an order of the Court fixing the amount. The Reorganized Debtors propose allowing the Claim as set forth in the Proposed Order attached hereto as Exhibit A . The Reorganized Debtors are prepared to address any questions from the Court or from Claimant regarding this proposed resolution at the Hearing.
Fifty-First Omnibus Objection			
Informal	JDB & Sons Construction Inc.	7647 7655 7696 7706 7707 7708 7709 7711	With Claimant's agreement, the Fifty-First Omnibus Objection is SUSTAINED with respect to these Claims. See Docket No. 10628.

Docket No.	Claimant	Claim No.	Resolution
Informal	Cosco Fire Protection, Inc.	69358 78400	The Reorganized Debtors have reached a settlement of this Claim in principle and a settlement agreement will be prepared and reviewed. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to May 26, 2021 at 10:00 a.m.
Sixtieth Omnibus Objection			
Informal	Mid-Century Insurance Company	79157	The Reorganized Debtors have reached a settlement of this Claim that resolves the Sixtieth Omnibus Objection.
Sixty-Second Omnibus Objection			
10452	City of Santa Cruz	2838	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to May 26, 2021 at 10:00 a.m.
Sixty-Ninth Omnibus Objection			
Informal	Whitebox Multi-Strategy Partners, LP as Transferee of CN Utility Consulting, Inc.	3630 78474	The Reorganized Debtors have reached a settlement of this Claim that resolves the Sixty-Ninth Omnibus Objection.
Informal	Whitebox Multi-Strategy Partners, LP as Transferee of Wright Tree Service of the West, Inc.	3667 68125 58854	The Reorganized Debtors have reached a settlement of this Claim that resolves the Sixty-Ninth Omnibus Objection.
Seventieth Omnibus Objection			
Informal	CRG Financial LLC as Assignee of Development Dimensions	87177	The Seventieth Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed.
Seventy-First Omnibus Objection			
Informal	Gerry Cargill	4903	The Seventieth Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed.

Docket No.	Claimant	Claim No.	Resolution
Seventy-Second Omnibus Objection			
Informal	Pizza Factory	4047	The Seventy-Second Omnibus Objection is SUSTAINED with respect to this Claim. See Docket No. 10629.

DECLARATION REGARDING STATUS AND RESOLUTION OF CLAIMS

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors

2. The foregoing status and resolution of certain Claims is true and correct to the best of my knowledge, information, and belief.

3. Attached hereto as **Exhibit A** is a true and correct copy of a proposed order the Reorganized Debtors plan to submit to resolve Claim No. 2932 (John I. Weaver).

4. This declaration was executed in San Francisco, California.

Dated: May 6, 2021

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors

Exhibit A

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(jkim@kbbkllp.com)
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10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

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- 17 ☐ Affects PG&E Corporation
18 ☐ Affects Pacific Gas and Electric Company
19 ☒ Affects both Debtors

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19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**[PROPOSED] ORDER FIXING IN
AMOUNT AND ALLOWING CLAIM NO.
2932 (JOHN I. WEAVER)**

[Re: Dkt. Nos. 9466 and 9672]

1 The Court having reviewed Claim No. 2932 (John I. Weaver), filed on May 6, 2019 (the
2 “**Claim**”), the *Reorganized Debtors’ Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed*
3 *Claims)* [Docket No. 9466] (the “**Forty-Fifth Omnibus Objection**”), of PG&E Corporation (“**PG&E**
4 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors
5 (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to the Plan (as defined below), the
6 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), the
7 Response to the Forty-Fifth Omnibus Objection by Mr. Weaver [Docket No. 10438-3], the letters to the
8 Court filed by Mr. Weaver on April 9, 2021 [Docket No. 10516] and May 6, 2021 [Docket No. 10624],
9 and the *Reorganized Debtors’ Report on Status and Resolution of Omnibus Objections with Respect to*
10 *Certain Claims* [Docket No. •]; and this Court having jurisdiction to consider the Claim pursuant to
11 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy
12 Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a); and consideration of the
13 Claim being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court
14 pursuant to 28 U.S.C. §§ 1408 and 1409; and pursuant to the representations of counsel for the
15 Reorganized Debtors at the hearing on this Claim that the Reorganized Debtors disclaim liability but
16 wish to resolve the Claim; and good cause appearing:

17 **IT IS HEREBY ORDERED THAT:**

- 18 1. The Claim is ALLOWED in the amount of \$8,000.
- 19 2. Prime Clerk LLC, the Debtors’ claims and noticing agent, is authorized to update the
20 official claims register for the Chapter 11 Cases to reflect the allowance ordered in paragraph 1 hereto.
- 21 3. The allowance ordered in paragraph 1 hereto does not constitute a finding as to any
22 wrongdoing or liability on the part of the Reorganized Debtors.
- 23 4. The Forty-Fifth Omnibus Objection is deemed WITHDRAWN with respect to the Claim.
- 24 5. This Court shall retain jurisdiction to resolve any disputes or controversies arising from
25 this Order.

26 *** END OF ORDER ***
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Court Service List

John I. Weaver
2948 E. Joaquin Place
Fresno, California 93726
ljweav@att.net

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